I am a federally licensed amateur radio operator,
and a member of the American Radio Relay League,
the National Association for Amateur Radio.

There are several technologies available that can
provide access to the internet, and the proposed
Broadband over Power Lines service is the
only one that has been proven to cause severe interference
to HF and VHF radio communication.

This radio frequency interference is not merely
alleged; it is well documented. It is the primary
reason why Japan, Finland, and Austria have
halted BPL deployments. Within the United States,
preliminary BPL testing has already caused severe interference
that has been recorded and documented by the
American Radio Relay League. It is available for public
viewing at the following URL: http://216.167.96.120/BPL_Trial-
web.mpg

In Austria, the matter that brought the issue to
a head was a Red Cross report that emergency
services radio traffic during a disaster response
drill last May was the victim of massive BPL
interference. This is very troubling since HF radio
communications is what our country can solely rely
on to provide communication in and out of disaster
areas during moments of crisis. Satellites, cellular
systems, and telecommunications links of all kinds
have been limited in their ability to respond when these
infrastructure based systems have been impaired
and overburdened. This fact is recognized by my employer
, one of the nations largest telecommunications companies ,
which has seen fit to strategically install HF communications
gear at most of their telecommunications switching offices.
This practice ensures my companies ability to communicate with
federal and local authorities during times of national crisis.
BPL , if not regulated properly, could very well destroy
these vital HF communications links, as well as the
Amateur Radio Service, a licensed service whose existence is
predicated
on it’s ability to provide a pool of experienced radio operators
and equipment to assist the public in emergency, health,
and welfare communications.

It would seem inappropriate for the Commission to allow BPL
to be implemented in any radio spectrum without serious regulation
against interference to licensed users of that spectrum. HF radio
spectrum presents its own unique problems for BPL because of it's
special characteristics of propagating weak signals over long
distances.
Most HF signals are very weak precisely because they have traveled
long distances, and HF radio receivers are highly sensitive and
susceptible
to radio noise sources of all kinds. It is for this reason that if
the

Commission plans to allow BPL to move forward either as a non-protected
“part 15” device, or as some sort of protected non-licensed user of HF spectrum,
then the Commission should without question adopt very tough regulations to
prevent interference to existing licensed users, and promote proactive interference
mitigation by BPL providers. Severe penalties must be imposed on those that
pollute our nations vital resources and impair our ability as a nation to respond
to security threats of any kind.

We can provide much better, and cleaner, broadband
access to homes in rural areas in the United States,
using the many other broadband technologies
available such as the continued promotion of cable access,
DSL, I-Burst, Fiber, Cellular, Satellite and 802.11
technologies that won't compromise Homeland
Security, as Broadband over Power line technology
will.

Thank you for the opportunity to comment.
Sincerely,

John R. Foulks
Amateur Radio Licensee - AB0TA